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JUL 24 2023

United States District Court
Eastern District of Missouri
Eastern Division

BRENNEN HURT – Plaintiff

Case No. 4:23-CV-836 HEA

EXETER FINANCE- Defendant

Jurisdiction and Venue:

1. This Court has jurisdiction over this action pursuant to 28 U.S.C 1331 as this action arises under the Constitution, LAWs, or treaties of the United States.
2. Venue is proper in this district under 28 U.S.C 1331 b (2) because the defendant EXETER FINANCE conducts business in this district and a substantial part of the events or omissions giving rise to the claims occurred herein.
3. Defendant has violated 4th amendment by seizing Plaintiffs personal property, without due process. Plaintiff is suppose to be protected in Person's, papers, from illegal practices.
4. Defendant has violated 5th amendment of the constitution by taking private information for public use without just compensation.
5. Defendant has taken plaintiff security/asset and has not compensated plaintiff after given private information from the beginning.
6. Defendant has ignored all claims and certified mail from plaintiff about his rights and defendants fiduciary duties under the contract.
7. Defendant failed to correctly disclose the terms and cost of consumer credit as required by the truth In lending act by denying the plaintiff's rightful beneficial interest in the coupon/security note thereby violating the ACT.
8. Defendant's denial of Plaintiff's beneficial interest in the coupon or contract without providing just compensation, is tantamount to a deprivation of property. The Fifth amendment of the Unites States Constitution prohibits such conduct, stating that "NO person shall... be deprived of life liberty, or property, without due process of law: Nor shall private property be taken for public use without just compensation.

9. The taking of Plaintiff's property by the defendant under these circumstances and without compensation amounts to an unjust enrichment of the defendant at the expense of the plaintiff. This enrichment is contrary to principles of equity and justice and violates the TAKING Clause of the Fifth Amendment.

for
Prayer of relief

Wherefore, Plaintiff BRENNEN HURT respectfully request that this court:

1. Declare the Defendant's actions violated the rights of the Plaintiff.
2. Order the defendant to provide just compensation for the beneficial interest that was unlawfully seized.
3. Award actually, statutory and punitive damages
4. Grant injunctive and/or declaratory relief as necessary to protect Plaintiff's rights.
5. Grant any other relief this COURT deems Just and Proper.

DATE: 07/20/2023

A handwritten signature in black ink, appearing to read "Brennen Hurt". The signature is somewhat stylized and includes a flourish at the beginning.

Brennen Hurt

Brennen Hurt
1630 Charleston Estates Dr
Florissant, MO, 63031

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Clerk of Court

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United States District Court

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